

1 Honorable Thomas S. Zilly
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 F.L.B., a minor, by and through his Next Friend,
Casey Trupin; et al.,

Case No. 2:14-cv-01026-TSZ

10 Plaintiffs-Petitioners,

STIPULATION AND PROPOSED
ORDER TO EXTEND CASE
MANAGEMENT DEADLINES

11 v.

12 Loretta E. LYNCH, Attorney General, United
States; et al.,

13 Defendants-Respondents,
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1 The parties, by and through their counsel of record, hereby submit the following
 2 Stipulation to Extend Case Management Deadlines. Although the parties are actively and
 3 diligently engaged in discovery, good cause exists to extend certain case management deadlines
 4 in order to accommodate the parties' discovery schedules. Specifically, the Court has ordered
 5 the disclosure of expert testimony by November 2, 2015 – in less than three weeks. Certain of
 6 the parties' expert witnesses will be unable to comply with that deadline due to other
 7 professional commitments and previously-scheduled travel plans.

8 In addition, the current discovery schedule contemplates that all motions related to
 9 discovery must be filed by November 25, 2015, and that discovery must be complete by
 10 December 18, 2015. Given that the Court directed Defendants to respond to Plaintiffs' first set
 11 of written discovery requests by October 1, 2015, and that the Court stayed Plaintiffs' noticed
 12 Rule 30(b)(6) deposition on Defendant DOJ until October 8, 2015, the schedule leaves less than
 13 two months for the parties to complete production of discovery, analyze the responses,
 14 determine whether motion practice is required, and then prepare any motions. The parties must
 15 also amend their pleadings, conduct depositions, and prepare expert witnesses during this time
 16 period.

17 The parties acknowledge that the Court's current schedule hews closely to the schedules
 18 the parties proposed in their Joint Status Report of May 29, 2015. Dkt. 155 at 8-9. Due to the
 19 parties' disputes regarding the appropriate scope of discovery in this case, which were not fully
 20 resolved until late August 2015, the parties were unable to conduct discovery during most of
 21 the summer. This has further compressed the current case management timetable.

22 In light of the competing professional commitments and travel plans of the expert
 23 witnesses, the complexity of this case, and the amount of discovery the parties must undertake
 24 in a relatively short time frame, the parties respectfully request a 30-day extension of the expert
 25 disclosure date and the subsequent case management deadlines, as described below. The
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1 parties' proposed schedule maintains the Court's previously-set dates for pretrial filings and
 2 trial, but the parties would be amenable to resetting those dates in order to accommodate the
 3 Court's calendar.

4 Deadline	5 From	6 To
5 Disclosure of expert testimony	November 2, 2015	December 2, 2015
6 Discovery motions filed by	November 25, 2015	December 23, 2015
7 Discovery complete by	December 18, 2015	January 22, 2016
8 Dispositive motions filed by	January 28, 2016	February 25, 2016
9 All motions in limine filed by	March 31, 2016	March 31, 2016
10 Pretrial order due	April 18, 2016	April 18, 2016
11 Trial briefs, et al., due by	April 18, 2016	April 18, 2016
12 Pretrial conference	April 22, 2016	April 22, 2016
13 Bench trial	May 2, 2016	May 2, 2016

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15 ACLU Immigrants' Rights Project	16 Northwest Immigrant Rights Project
16 By: <u>s/ Ahilan Arulanantham</u> Ahilan Arulanantham, <i>pro hac vice</i> Cecilia Wang, <i>pro hac vice</i> Stephen Kang, <i>pro hac vice</i>	17 By: <u>s/ Matt Adams (with permission)</u> Matt Adams, WSBA # 28287 Glenda M. Aldana Madrid, WSBA # 46987
19 Attorneys for Plaintiffs	19 Attorneys for Plaintiffs
20	20 United States Department of Justice
21	21 By: <u>s/ William C. Silvis (with permission)</u> William C. Silvis Leon Fresco Nicole Murley
22	22 Attorneys for Defendants
23	23
24	24

25 DATED this 14th day of October, 2015.

[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, and the parties having shown good cause to extend the requested case management deadlines, it is hereby ordered that the case management deadlines are extended as follows:

	Deadline	Date
5	Disclosure of expert testimony	December 2, 2015
6	Discovery motions filed by	December 23, 2015
7	Discovery complete by	January 22, 2016
8	Dispositive motions filed by	February 25, 2016
9	All motions in limine filed by	March 31, 2016
10	Pretrial order due	April 18, 2016
11	Trial briefs, et al., due by	April 18, 2016
12	Pretrial conference	April 22, 2016
13	Bench trial	May 2, 2016
14	All other deadlines remain unchanged.	
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DATED:

Thomas S. Zilly
United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of October, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

By: s/ Ahilan Arulanantham
Ahilan Arulanantham, *pro hac vice*